



CDSS

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DEPARTMENT OF SOCIAL SERVICES
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ARNOLD SCHWARZENEGGER
GOVERNOR

August 18, 2010

Scott Gruendl, Director
Glenn County Human Resource Agency
P.O. Box 611
Willows, CA 95988

Dear Mr. Gruendl:

I want to take this opportunity to thank you and your staff for the cooperation and assistance provided the reviewer from our office during the course of the Civil Rights Compliance Review of December 2009. Enclosed is the final report on the review.

There are some compliance issues (deficiencies) identified in the report, which will require the development of a corrective action plan (CAP). Please submit your CAP within sixty days of this letter. Please address each deficiency and include steps and time lines for the completion of all corrective actions and recommendations listed in the attached report.

We will provide a copy of our report to any individual who makes a valid Public Records Act (PRA) request. Our reports are considered public documents under the PRA. Once we approve your CAP, it too, becomes a public document. Per the Governor's Executive Order S-08-09, all compliance reviews (and corresponding CAPs) performed after January 2008 will be posted on the state's Reporting Government Transparency website.

If you need technical assistance in the development of your CAP, please feel free to contact the Civil Rights Bureau at (916) 654-2107. You may also contact us by e-mail at crb@dss.ca.gov.

Sincerely,

Jim Tashima, Acting Chief
Civil Rights Bureau
Human Rights and Community Services Division

Enclosure

c: Suzi Kochems, Civil Rights Coordinator

Chris Webb-Curtis, Branch Chief, CDSS Supplemental Nutrition Assistance Program
M.S. 8-9-32

Mike Papin, CDSS Supplemental Nutrition Assistance Program
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**CIVIL RIGHTS COMPLIANCE REVIEW REPORT
FOR**

COUNTY OF GLENN

Conducted December 7 – 9, 2009

California Department of Social Services

Human Rights and Community Services Division

Civil Rights Bureau

744 P Street, M.S. 8-16 70

Sacramento, CA 95814

(916) 654-2107

Reviewer

Cindy Guzman

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CIVIL RIGHTS COMPLIANCE REVIEW REPORT

I. INTRODUCTION

The purpose of this review by the California Department of Social Services (CDSS) Civil Rights Bureau (CRB) staff was to assess the Glenn County Human Resource Agency with regard to its compliance with CDSS Manual of Policies and Procedures (MPP) Division 21 Regulations, and other applicable state and federal civil rights laws.

An on-site compliance review was conducted on December 8- 9, 2009 with Suzi Kochems, Civil Rights Coordinator. An exit meeting was held on December 10, 2009 to review the findings.

The review was conducted in the following locations:

Name of Facility	Address	Programs	Non-English languages spoken by a substantial number of clients (5% or more)
Glenn County Human Resources Agency	420 E. Laurel Street Willows, CA 95988	Food Stamps, CalWORKS	Spanish, Hmong, Laotian
Glenn County Human Resources Agency (North County)	604 E. Walker Street, Suites A & C Orland, CA 95963	Food Stamps, CalWORKS, Children's Services, APS/IHSS	Spanish, Hmong, Laotian

II. SUMMARY OF METHODOLOGY

In preparing for this review, CDSS staff completed the following tasks:

- Reviewed the 2010 Annual Civil Rights Plan submitted by the County.
- Reviewed the civil rights discrimination complaint database for a complete listing of complaints filed against the County for the last year.

Headquarters and on-site review procedures included:

- Interviews of public contact staff
- Survey of program managers
- Case file reviews
- Facility inspections

Each site/program was reviewed for compliance in the following areas:

- Dissemination of Information
- Facility Accessibility for Individuals with Disabilities
- Bilingual Staffing/Services for Non-English-Speaking Clients
- Accessibility for Clients with Visual or Hearing Impairments
- Documentation of Client Case Records
- Staff Development and Training
- Discrimination Complaint Procedures

Here is a summary of the sources of information used for the review:

Interviews Conducted of Public Contact Staff

Classifications	Total	Bilingual
Eligibility Workers	6	5
Children Social Workers	1	
Adult Program Workers	1	1
Receptionist/Screeners	2	2
Total	11	8

One additional interview was scheduled but not conducted due to staff unavailability.

Program Manager Surveys

Number of surveys distributed	4
Number of surveys received	4

Reviewed Case Files

English speakers' case files reviewed	3
Non-English or limited-English speakers' case files reviewed	25
Languages of clients' cases	Spanish, Hmong, Laotian

Sections III through VIII of this report contain specific Division 21 civil rights requirements and present field review findings regarding the county's compliance with each requirement. The report format first summarizes each requirement, then the actual review team findings, including appropriate comparisons. This format is an effort to validate the application of policies and procedures contained in the annual plan. Required corrective actions are stated at the end of each section.

Section IX addresses the review of the latest Civil Rights Compliance Plan.

Section X of the report is reserved for a declaration of overall compliance.

III. DISSEMINATION OF INFORMATION

Counties are required to disseminate information about program or program changes and about how applicants and recipients are protected by the CDSS regulations (Division 21). This dissemination should occur through outreach and information to all applicants, recipients, community organizations, and other interested persons, including non- and limited-English speakers and those with impaired hearing or vision or other disabling conditions.

A. Findings

Access to Services, Information and Outreach	Yes	No	Some-times	Comments
Does the county accommodate working clients by flexing their hours or allowing applications to be mailed in?	X			Case Managers for Employment Services have the option of flexing their work hours to accommodate clients who need to be seen after hours. Child Welfare Services has 24-hour emergency response workers on call Sunday through Saturday. Applications can be taken over the telephone.
Does the county have extended hours to accommodate clients?	X			Case Managers for Employment Services have the option of flexing their work hours to accommodate clients who need to be seen after hours. Child Welfare Services has 24-hour emergency response workers on call Sunday through Saturday.
Can applicants access services when they cannot go to the office?	X			By telephone, Mail, E-mail, Home visits are

				available when necessary.
Does the county ensure the awareness of available services for individuals in remote areas?	X			Through website and through Family Resource Centers. Tribal TANF program provides outreach to individuals living at the Grindstone Indian Rancheria. Business Services representative provides information and resource information to all areas in the county.

Signage, posters, pamphlets	Yes	No	Sometimes	Comments
Does the county use the CDSS pamphlet "Your Rights Under California Welfare Programs" (Pub 13)?	X			The pamphlet is provided with the application packet. Staff interviewed indicated the pamphlet is explained to the client at intake and recertification.
Is the pamphlet distributed and explained to each client at intake and re-certification?	X			
Was the current version of Pub 13 available in English, Spanish, Lao, Vietnamese, Chinese, Hmong, Russian, Korean, Farsi, Arabic, Laotian, Tagalog, Armenian and Cambodian?	X			
Was the Pub 13 available in large print, audiocassette and Braille?	X			
Were the current versions of the required posters present in the lobbies?	X			
Did the workers know the location	X			

Signage, posters, pamphlets	Yes	No	Some-times	Comments
of the required posters with the Civil Rights Coordinator's name and address?				
Were there instructional and directional signs posted in waiting areas and other places frequented by a substantial number of non-English-speaking clients translated into appropriate languages?	X			

The most recent version for each of the above referenced documents is:

Pub 13	"Your Rights under California Welfare Programs"	03/07
Pub 86	"Everyone is Different, but Equal Under the Law"	03/07
Form AD 475B	"And Justice for All"	12/99

Contact your program consultant to receive the most recent versions, or download the Pub 13 from the CRB website
http://www.dss.cahwnet.gov/civilrights/YourRights_498.htm.

IV. FACILITY ACCESSIBILITY FOR INDIVIDUALS WITH DISABILITIES

The Americans with Disabilities Act (ADA) requires public accommodations to provide goods and services to people with disabilities on an equal basis with the rest of the general public. The goal is to afford every individual the opportunity to benefit from the services available. The federal regulations require that architectural and communication barriers that are structural must be removed in public areas of existing facilities when their removal is readily achievable; in other words, easily accomplished and able to be carried out without much difficulty or expense.

The facility review is based on four priorities supported by the ADA regulations for planning achievable barrier removal projects. The priorities include ensuring accessible approach and entrance to the facility, access to goods and services, access to restrooms, and any other measures necessary.

Note that the references to the Americans with Disabilities Act Accessibility Guidelines (ADAAG) in the Corrective Action column refer to the federal Standards for Design. Title 24 of California Code and Regulations (T24 CCR) is also cited because there are instances when California state law is stricter than ADAAG specifications.

The county must ensure that programs and activities are readily accessible to individuals with disabilities. This includes building accessibility and availability of accessible parking as well as accessibility of public telephones and restrooms.

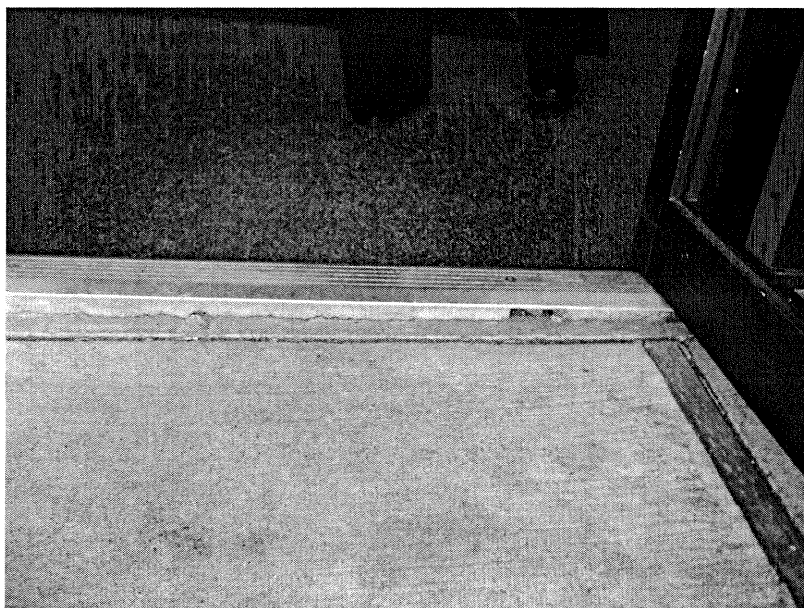
A. Findings and Corrective Actions

Regulations cited are from the Title 24, California Code of Regulations (T24 CCR) and ADAAG.

Facility Location: 420 E. Laurel Street, Willows, CA 95988

Facility Element	Findings	Corrective Action
Parking	There is no public parking lot for clients. City street parking available.	N/A
Main Entrance	The threshold at the main entrance is too high (over an inch on the outside and just over a half inch on the inside). Please refer to Picture (Fig. A).	Landings or floors are no more than ½" lower than top of threshold. (CA T24 1133B.2.4.1, ADA 4.13.8) p 207
Men's Restroom	Accessible urinal is too high at 22 1/2 inches above the floor.	Rim height shall be a maximum of 17" in height above the floor. (CA T24 1115B.4.2.1) p 285 Urinals: Where there are urinals provided, at least one (1) shall provide a clear floor space of 30" wide x 48" deep in front of the urinal to allow for a forward approach. This clear space may extend 6" maximum under the urinal if the urinal has a 9" minimum toe clearance from the floor to the urinal's bottom. (CA T24 1115B.4.2.3,

		ADA 4.18.3 & 4.22.5) p. 285
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(Fig. A)

Facility Location: 604 E. Walker Street, Suites A & C, Orland, CA 95963

Facility Element	Findings	Corrective Action
Men's Restroom	Door Pressure too high at 10 lbs.	Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5, ADA 4.13.11(2)(b)) p. 201
	Toilet protector too high at 53".	If towel, sanitary napkins, waste receptacles, and other similar dispensing and disposal fixtures are provided, at least one of each type is located with all operable parts, including coin slots, at a maximum height of 40". (CA T24 1115B.8.3, ADA 4.23.7) p. 294

Women's Restroom	Door Pressure too high at 9 lbs.	Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5, ADA 4.13.11(2)(b)) p. 201
	Toilet protector too high at 53".	If towel, sanitary napkins, waste receptacles, and other similar dispensing and disposal fixtures are provided, at least one of each type is located with all operable parts, including coin slots, at a maximum height of 40". (CA T24 1115B.8.3, ADA 4.23.7) p. 294
	Soap dispenser too high at 47".	If towel, sanitary napkins, waste receptacles, and other similar dispensing and disposal fixtures are provided, at least one of each type is located with all operable parts, including coin slots, at a maximum height of 40". (CA T24 1115B.8.3, ADA 4.23.7) p. 294
	Feminine Product Dispenser too high at 44".	If towel, sanitary napkins, waste receptacles, and other similar dispensing and disposal fixtures are provided, at least one of each type is located with all operable parts, including coin slots, at a maximum height of 40". (CA T24 1115B.8.3, ADA 4.23.7) p. 294

V. PROVISION FOR SERVICES TO APPLICANTS AND RECIPIENTS WHO ARE NON-ENGLISH-SPEAKING OR WHO HAVE DISABILITIES

Counties are required by Division 21 to ensure that effective bilingual/interpretive services are provided to serve the needs of the non-English-speaking population and individuals with disabilities without undue delays. Counties are required to collect data on primary language and ethnic origin of applicants/recipients (identification of primary language must be done by the applicant/recipient).

Using this information, a county may determine 1) the number of public contact staff necessary to provide bilingual services, 2) the manner in which they can best provide interpreter services without bilingual staff and 3) the language needs of individual applicants/recipients. Counties must employ an appropriate number of certified bilingual public contact employees in each program and/or location that serves a substantial number of non-English-speaking persons. In offices where bilingual staff are not required because non-English-speaking persons do not represent a substantial number, counties must provide effective bilingual services through interpreter or other means.

Counties must also provide auxiliary aids and services, including Braille material, taped text, qualified interpreters, large print materials, telecommunication devices for the deaf (TDD's), and other effective aids and services for persons with impaired hearing, speech, vision or manual skills. In addition, they must ensure that written materials be available in individuals' primary languages when the forms and materials are provided by CDSS, and that information inserted in notices of action (NOA) be in the individuals' primary language.

A. Findings from Program Manager Surveys, Staff Interviews and Case File Reviews

Question	Yes	No	Some-times	Comments
Does the county identify a client's language need upon first contact? How?	X			An intake screener evaluates what language the person speaks and then it is documented in CWS. The County has an interpreter/Flash Form.
Does the county use a primary language form?		X		
Does the client self-declare on this form?		N/A		

Question	Yes	No	Some-times	Comments
Are non-English- or limited- English-speaking clients provided bilingual services?	X			
After it has been determined that the client is limited-English or non-English speaking, is there a county process for procuring an interpreter?	X			
Is there a delay in providing services?		X		
Does the county have a language line provider, a county interpreter list, or any other interpreter process?	X			
Are county interpreters determined to be competent?	X			
Does the county have adequate interpreter services?	X			
Does the county allow minors to be interpreters? If so, under what circumstances?		X		
Does the county allow the client to provide his or her own interpreter?	X			
Does the county ensure that the client-provided interpreter understands what is being interpreted for the client?	X			

Question	Yes	No	Some-times	Comments
Does the county use the CDSS-translated forms in the clients' primary languages?	X			
Is the information that is to be inserted into NOA translated into the client's primary language?	X			
Does the county provide auxiliary aids and services, TDD's and other effective aids and services for persons with impaired hearing, speech, vision or manual skills, including Braille material, taped text, large print materials (besides the Pub 13)?	X			
Does the county identify and assist the client who has learning disabilities or a client who cannot read or write?	X			The County helps the client by reading to them and/or writing for them.
Does the county offer screening for learning disabilities?	X			The County has a contract with the Colusa County One Stop where the learning disabilities coordinator conducts the assessments.
Is there an established process for offering screening?	X			
Is the client identified as having a learning disability referred for evaluation?	X			

VI. DOCUMENTATION OF APPLICANT/RECIPIENT CASE RECORDS

Counties are required to ensure that case records document applicant's/recipient's ethnic origin and primary language, the method used to provide bilingual services, information that identifies an applicant/recipient as disabled, and an applicant's/recipient's request for auxiliary aids and services.

A. Findings from Case File Reviews and Staff Interviews

Documented Item	Children's Services	Adult Programs	CalWORKs	Non-Assisted Food Stamps
Ethnic origin documentation	ER/Referral CWS/CMS	Soc 341 Soc 295	SAWS 1	DFA 285
Primary language documentation	Court Documents	Soc 341 Soc 295	SAWS 1 Green Information Card on File.	DA 285
Method of providing bilingual services and documentation	Bilingual Staff, telephone interpreters and court ordered interpreters	Bilingual Staff, Language Line Interpreters. Found good documentation regarding how language services were provided.	Bilingual Staff is used. Found some documentation regarding how language services were provided. However, some documentation was missing.	Bilingual Staff is used. Found good documentation regarding how language services were provided.
Client provided own interpreter	Would be in Case Comments.	In Case Comments.	In Case Comments.	In Case Comments.
Method to inform client of potential problem using own interpreter	Would be in Case Comments.	In Case Comments.	In Case Comments.	In Case Comments.
Release of information to Interpreter	None noted.	None noted	Found release form in most files.	None noted.

Documented Item	Children's Services	Adult Programs	CalWORKs	Non-Assisted Food Stamps
Individual's acceptance or refusal of written material offered in primary language	None noted. Would be in Case Comments	None noted. Would be in Case Comments	None noted. Would be in Case Comments	None noted. Would be in Case Comments
Documentation of minor used as interpreter	None found in cases reviewed.	None found in cases reviewed.	None found in cases reviewed.	None found in cases reviewed.
Documentation of circumstances for using minor interpreter temporarily	None found in cases reviewed.	None found in cases reviewed.	None found in cases reviewed.	None found in cases reviewed.
Translated notice of actions (NOA) contain translated inserts	None noted	None noted	Inserts were translated on the NOA.	Inserts were translated on the NOA.
Method of identifying client's disability	Would be in case comments.	Soc 341 Soc 295 Health questionnaire	Would be in case comments.	Would be in case comments.
Method of documenting a client's request for auxiliary aids and services	Would be in case comments.	Would be in case comments.	Would be in case comments.	Would be in case comments.

B. Corrective Actions: None

VII. STAFF DEVELOPMENT AND TRAINING

Counties are required to provide civil rights and cultural awareness training for all public contact employees, including familiarization with the discrimination complaint process and all other requirements of Division 21. The training should be included in orientation,

as well as the continuing training programs.

A. Findings

Interview questions	Yes	No	Some-times	Comments
Do employees receive continued Division 21 Training?	X			Workers stated they receive continued Division 21 Training, and that it is mandated.
Do employees understand the county policy regarding a client's rights and procedure to file a discrimination complaint?	X			Workers understand the county policy regarding a discrimination complaint.
Does the county provide employees Cultural Awareness Training?	X			
Do the CSW's have an understanding of MEPA (Multi-Ethnic Placement Act)?	X			
Do the employees seem knowledgeable about the predominant cultural groups receiving services in their area?	X			

B. Corrective Actions: None

VIII. DISCRIMINATION COMPLAINT PROCEDURES

Counties are required to maintain a process for addressing all complaints of discrimination. They must track complaints of discrimination through the use of a control log in which all relevant information is kept, including when the complaint was received, the name of the complainant, identifying numbers and programs, basis of discrimination, and resolution. It is usually the Civil Rights Coordinator responsibility to maintain this log.

A. Findings from Staff Interviews and Program Manager Surveys

Interview and review areas	Yes	No	Some-times	Findings
Can the employees easily identify the difference between a program, discrimination, and a personnel complaint?	X			
Did the employees know who the Civil Rights Coordinator is?	X			
Did the employees know the location of the Civil Rights poster showing where the clients can file a discrimination complaint?	X			
When reviewing the complaint log with the Civil Rights Coordinator, was it complete and up to date?	X			

B. Corrective Action: None

IX. CIVIL RIGHTS COMPLIANCE PLAN

Thank you for submitting your agency's Civil Rights Compliance Plan for 2010. It is approved as submitted.

X. CONCLUSION

The CDSS found Glenn County Human Resources Agency was found to be in substantial compliance with CDSS Manual of Policies and Procedures (MPP) Division 21 Regulations, and other applicable state and federal civil rights laws. CDSS commends Glenn County for providing the services with such sensitivity and

responsiveness to the culturally-diverse population served.

The Glenn County Human Resources Agency must remedy the violations identified in this report by taking corrective actions. A corrective action plan must be received by CDSS within 60 days of the date of the cover letter to this report; and the plan must include a schedule by which all actions will be taken to correct the violations.

It is our intent that this report be used to create a positive interaction between the county and CDSS in identifying and correcting compliance violations and to provide the county with an opportunity to implement corrective action to achieve compliance with Division 21 regulations. Civil Rights staff is available to provide technical assistance as requested.